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July 10, 2006

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#### VIA E-FILE AND HAND DELIVERY

The Honorable Joseph J. Farnan, Jr. United States District Court District of Delaware 844 King Street Wilmington, DE 19801

ROBERT W WHETZEL

DIRECTOR

Re: Jury Questionnaire

L.G. Philips LCD Co. Ltd. v. Tatung Company et. al.,

C.A. No. 05-292 (JJF)

Dear Judge Farnan:

During the pre-trial conference on July 7, 2006, the Court requested that the parties discuss and agree upon a proposed jury questionnaire. Attached as Exhibit A is a set of questions the parties have agreed upon. Attached as Exhibit B is a set of questions the parties could not agree upon. The parties respectfully request that Your Honor decide which questions from Exhibit B should be presented to the jury.

If Your Honor has any questions regarding this matter, the parties remain available at the Court's convenience.

Respectfully,

Robert W. Whetzel

RWW/mxk

ce: Richard D. Kirk, Esquire (By Electronic Filing and Hand Delivery)
Gaspare J. Bono, Esquire (By e-mail)

## **EXHIBIT A**

### **Juror Questionnaire**

#### **Delaware Federal Court**

July 2006

Thank you for coming to court as a potential juror! In order to select a jury, the judge and the people involved in the case need to know something about you so that they can select jurors who are able to be fair to both sides

Everyone has attitudes and opinions that are shaped by their life experiences. Sometimes these experiences can make it difficult to look at a certain issue in an unbiased and unemotional way. As a juror, you must return a verdict based on the law and on the facts proved in court, not on emotion or on other views not supported by the evidence. The judge will give you instructions on the law and on how you should go about deciding the case. You must listen to and follow the judge's instructions.

The questions on this form are designed to help the court and the lawyers learn something about your background and your views on issues that may be related to this case. The questions are asked not to invade your privacy, but to make sure that you can be a fair and impartial juror. If there is any reason why you might not be able to give both sides a fair trial in this case, it is important that you say so.

PLEASE PRINT ALL YOUR ANSWERS. IF THERE IS NOT ENOUGH ROOM TO ANSWER COMPLETELY,
THERE IS SPACE TO CONTINUE ON THE LAST PAGE OF THIS QUESTIONNAIRE.

| 1. Juror # 2. Full Name:  | Age:  |
|---|---|
| 3. Your highest level of education completed:  Grade school or less High school graduate Some college or AA degree (major): Technical or vocational school (major): College graduate (major): Post graduate study (major & degree): | 4. Have you or has anyone close to you had training or work experience in any of the following: (Check all that apply)  Electrical Engineering  LCD monitors  Computer design  Integrated Circuit Design/Manufacturing  Mechanical Engineering  Product Development/Design  Law  IF YES to any, please explain: |
| 5. Have you ever been a plaintiff in a civil lawsuit?YesNo IF YES, please describe:   | 6. Have you ever been a defendant in a civil lawsuit? Yes No IF YES, please describe:   |
| 7. Have you, or has someone close to you, ever applied for or obtained a patent or trademark?  Yes No IF YES, please explain:   | 8. Do you have any disability or problem that would make it difficult or impossible for you to serve as a member of the jury in this case?  IF YES, please explain:   |

I swear that all the foregoing is true and correct, and that I completed this questionnaire without any assistance.

SIGNATURE AND DATE:

# **EXHIBIT B**

## **Juror Questionnaire**

## **Delaware Federal Court**

July 2006

| Disputed Questions  |  |  |   |  |
|---|--|--|---|--|
| 1. Is English your first language?YesNo IF NO, what is?   | What language(s) other than English do you speak (if any)? |  | 3. With regard to your home:  Own Rent Live with others, do not pay rent                      |  |
| Do you have friends and/or relatives who are Korean, Chinese and/or Taiwanese? Check all that apply.  No Korean Chinese Taiwanese                                       |  |  |   |  |
| 5. Your present employment status (check all that apply)  Do not work outside the home Self en  Temporarily laid off Retired  Unemployed, not looking for work Part-tir |  | mployed<br>d in(year)  | Employed part time Working more than one job Unemployed, looking for work Full-time student   |  |
| Have you or a family member ever been union?  Yes No  | n a member of a  | 7. Does you job involve a No IF YES, approximately how   | ,   |  |
| 8. Have you ever made a claim for any of Disability Yes Workers' Compensation Yes Bankruptcy Yes  | the following?<br>No<br>No<br>No                           | 9. How many times have you served on a jury? 0 1 2 More than 2  10. What kinds of cases did you hear?  Civil Criminal Both Civil and Criminal  11. In how many cases did the jury reach a verdict? |   |  |
| 14. What is your primary (most important)  TV Friends Radio Internet Newspaper None, I don't  |  | 12. In how many cases di<br><br>13. Was your jury experie  | d the jury reach a verdict? d you serve as foreperson? ence positive or negative? ed Negative |  |
| 15. Have you ever served as a juror in an in property infringement lawsuit?  Yes No   | ntellectual IF`  | YES, indicate the type(s) of la Patent Infringement Copyright infringement Misappropriation  | Trademark Infringement Trade Secret   |  |
| 16. What is your primary political affiliation Republican Independent Democrat Other  | n?<br>None   | Frequently   | u discuss political issues? Seldom Never  |  |
| 18. Do you feel that a company that is sue prove that it has done nothing wrong?  Yes, definitely Yes, probably   | d should have to   | 19. Have you, or has anyo<br>a company that desig  | one close to you, ever worked for gned products which later became Yes No                     |  |
| 20. Have you, any member of your immedi<br>anyone close to you ever had any dea<br>United States Patent and Trademark C<br>Yes No IF YES, p                             | lings with the   | 21. Do you have any view<br>to get a patent?<br>Yes No   | rs about how easy or difficult it is  |  |
| 22. Have you ever worked for a company of has been involved in a patent dispute.  Yes No  |  | Office makes mistake   | nk that it is that the U.S. Patent e in awarding patents? Not very likely Not at all likely   |  |

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| 24. Do you have any personal opinions or beliefs that would prevent them from recognizing and protecting intellectual property, including patents?  Yes No IF YES, please explain:   | 25. Does any member of the panel have any feelings either for or against corporations that would affect your role as a juror?  Yes No IF YES, please explain:  |
|--|--|
| 26. How important are experts in helping you to decide when you are faced with an important decision about what is right and wrong?  Very important Not very important Not at all important  | 27. Have you ever worked for a company that was unfairly harmed by a business competitor?  Yes No  |
| 28. Do you think that business executives from Taiwan have higher, lower, or the same standards for business ethics as American business executives?  Higher Lower The Same  | 29. Do you think that business executives from Korea have higher, lower, or the same standards for business ethics as American business executives?  Higher Lower The Same   |
| 30. How much do you agree or disagree with the following statement? "It is a good idea that patents protect an inventor from competition for many years to come."  Strongly Disagree Somewhat Agree Somewhat Disagree Strongly Agree | 31. How much do you agree or disagree with the following statement? "An important function of juries in America is to send messages to corporations to improve their behavior."  Strongly Disagree Somewhat Agree Somewhat Disagree Strongly Agree |
| 32. How much do you agree or disagree with the following statement? "Patents on new inventions only serve to raise consumer prices on the resulting products."  Strongly Disagree Somewhat Agree Somewhat Disagree Strongly Agree    |  |